

**Before the
Federal Communications Commission
Washington, D.C. 20554**

| | | |
|-------------------------------------|---|---------------------------|
| In the Matter of |) | |
| |) | |
| Schools and Libraries |) | CC Docket No. 02-6 |
| Universal Service Support Mechanism |) | |
| |) | |
| Request for Waiver |) | |
| Of the Commission's Rules |) | Application No. 161048265 |
| By Missoula County Public Schools |) | |

**REQUEST FOR WAIVER
OF THE COMMISSION'S RULES
BY MISSOULA COUNTY PUBLIC SCHOOLS**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,¹ Missoula County Public Schools² (Missoula or the District) hereby respectfully requests a waiver of the filing deadline, section 54.720 of the Commission's rules, to appeal USAC's decision to rescind its entire Category 2 Schools and Libraries Universal Service (E-rate) funding for Funding Year 2016 due to Missoula's failure to respond to a question Missoula did not expect and did not know it had received from USAC.

USAC committed nearly \$500,000 in Category 2 funding. More than nine months later, USAC asked questions regarding Category 2 funding by location—an issue that Missoula had been trying to correct that entire year due to issues with the E-rate Productivity Center (EPC). Missoula had correctly submitted the funding requests with the correct locations, but the EPC system later did not show all of the locations that should have been associated with each funding

¹ 47 C.F.R. §§ 54.719(b), 54.722.

² Billed Entity Number 135105. The FRN at issue is 1699109896.

request. USAC created an “appeal” but USAC told Missoula no action was needed by Missoula at that time. Subsequently, USAC rescinded Missoula’s entire funding commitment in full because it found Missoula failed to timely respond to USAC’s request for information—a request Missoula did not know it had received. Missoula was therefore confused by USAC’s revised funding commitment and did not understanding the funding commitment had been rescinded until it tried to submit an invoice.

Missoula’s request for waiver of the appeal filing deadline would not be necessary but for these errors caused by USAC, including systematic problems with the EPC portal that were beyond Missoula’s control and USAC’s failure to clearly ask Missoula to respond to its inquiry.

For the foregoing reasons, Missoula requests that the Commission waive section 54.720 of the Commission’s rules to accept its appeal filed with the Commission as timely and to the extent necessary to grant the requested relief. Missoula only wants the opportunity to respond to USAC’s questions and properly adjust the Category 2 funding to the correct location, as it had originally been submitted. On remand, the Commission should direct USAC to correct errors that were created by EPC in the first place.

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I. BACKGROUND

Missoula County Public Schools is located in Missoula, Montana. Missoula County Public Schools serves area students through nine elementary schools, three middle schools, and four high schools (three in Missoula and one in Seeley Lake, Montana). The District also operates an Alternative High School program, Early Learning Preschool program at Jefferson Center, and an adult education program at The Lifelong Learning Center.

On May 26, 2016, Missoula filed its FCC Form 471 No. 161048265 requesting funding for Category 2 E-rate services.³ It received a commitment for a little less than \$500,000 more than a year later, on June 30, 2017.⁴

In October 2017, Missoula attempted to submit a Form 500 in EPC to correct data in the Form 471 for individual FRN line items, but the EPC filing tool was not working properly.⁵ Missoula attempted to file the Form 500 to reduce the amount requested for certain schools and to provide additional detail USAC had requested for certain line items in FRN 1699109896.⁶ For example, EPC incorrectly showed only one school as the Recipient of Service for a particular FRN line item, whereas Missoula's originally filed Form 471 listed five schools as the

³ Exhibit 1, Missoula County Public Schools FCC Form 471, No. 161048265, filed May 26, 2016 (Missoula Form 471).

⁴ See Exhibit 2, USAC Commitment Adjustment Letter, October 17, 2018, at 3 (USAC COMAD); Exhibit 3, FRN Status Tool with Revised Funding Commitment Decision, August 16, 2018 (FRN Status Tool with RFCDL).

⁵ See Exhibit 4, Case in EPC re 471# 161048265, Case 203377 (EPC Case 203377) (The case thread reads: "I just uploaded a file that documents how the form 500 is not bringing up all of the entity details related to a single FNR line item."); Exhibit 5, Case in EPC re 471# 161048265, Case 202796 (EPC Case 202796) (The case descriptions states: "I am having problems completing a Form 500 for FRN 1699109896.").

⁶ Exhibit 7, Case in EPC re 471# 161048265, Case 233709 (EPC Case 233709).

Recipients of Service for that FRN line item.⁷ Missoula opened several customer service cases to correct the problem, but the issue was not resolved.⁸ In February 2018, Missoula received notification that USAC had initiated an “appeal” of the District’s application.⁹ USAC noted that the Recipient of Service (ROS) allocation did not equal the FRN line amounts on the FCC Form 471.¹⁰ Importantly, the notification stated that no action was required by Missoula and the District would receive a Revised Funding Commitment Decision Letter (RFCDL) after USAC’s review.¹¹ Based on this message from USAC, Missoula believed it did not need to take any further action concerning the ROS allocation until it received further notification from USAC.

In April 2018, Missoula again attempted to complete and submit a Form 500 in EPC to correct the data errors, but it continued to receive error messages.¹² Missoula did not receive any additional communication from USAC, so it believed the ROS allocation issues had been resolved. At this time, Missoula did not have any reason to believe that USAC required additional information concerning these issues and it could proceed with filing its reimbursement

⁷ See, e.g., Exhibit 10, Missoula Category Two FRN #1699109896.001 Discrepancies, April 11, 2018 (Missoula Category Two Discrepancies).

⁸ Exhibit 4, EPC Case 203377 (The case description states: “I have submitted case #202796 which was closed after a quick answer. I called USAC as advised. A new case was created # 202837 and I was to e-mail some screen shots. Those were sent via e-mail as the support person said I should do. When I went in today to check on that 2nd case, I found it too was closed, though no resolution or help was provided. Please help as the information coming up in the form 500 filing tool is not working properly for this School District.”). The District opened the following customer service cases concerning Form 500 issues: 203377, 202796, 202837. See *id.*

⁹ Exhibit 6, ROS Allocation Mismatch - #89515, February 12, 2018 (ROS Allocation).

¹⁰ *Id.*

¹¹ *Id.*

¹² Exhibit 7, EPC Case 233709 (The case description states: “We are having problems in USAC with 471 #161048265 which is preventing completion of Form 500.”). See also, Exhibit 10, Missoula Category Two Discrepancies (evidencing Form 471 data discrepancies). In its response on the case thread, dated April 26, 2018, it appears USAC, on its own initiative, opened an appeal on this matter. Exhibit 7, EPC Case 233709.

request for Funding Year 2016. On June 16, 2018, therefore, Missoula attempted to file a Form 472 BEAR, but it received server error messages in EPC.¹³ Missoula opened another customer service case to resolve the EPC error and also requested an extension to file its invoices.¹⁴ Two days later, Missoula submitted its BEAR form.¹⁵

After successfully submitting the BEAR, Missoula assumed it would receive reimbursement for its invoice. However, on August 16, 2018, USAC issued a RFCDL adjusting Missoula's funding commitment to zero because Missoula did not authorize "sufficient modifications to the Category Two funding requests."¹⁶ The RFCDL also noted that the "appeal" had been cancelled because Missoula did not authorize "sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget." This was confusing to Missoula because it had never filed an appeal. Then, on October 17, 2018, USAC issued a commitment adjustment letter (COMAD) rescinding Missoula's funding commitment in full because the District failed to timely respond to USAC's request for information.¹⁷ But for the RFCDL and COMAD, however, the District had no notice that USAC had requested any additional information.

¹³ Exhibit 9, Case in EPC re 471# 161048265, Case 239970 (EPC Case 239970). The District's first attempt to submit the BEAR form resulted in a server error. On its second attempt, the District received a message that the vendor had not filed its Form 473. The vendor attempted to file Form 473, but it too received error messages upon submitting documents through EPC. *See id.*

¹⁴ Exhibit 9, EPC Case 239970.

¹⁵ Exhibit 12, Missoula Bill Entity Applicant Reimbursement Form, FCC Form 472 No. 2822715, filed June 18, 2018 (Missoula BEAR Form). Missoula requested a total reimbursement of \$129,873.31 for Category Two services. *Id.* at 1.

¹⁶ Exhibit 3, FRN Status Tool with RFCDL; Exhibit 11, USAC Revised Funding Commitment Decision Letter, August 15, 2018, at 5 (USAC RFCDL).

¹⁷ Exhibit 2, USAC COMAD.

To make matters worse, in November 2018, Missoula received a Form 472 Notification Letter, stating “No Payment, Total Commitment Paid.”¹⁸ Given the confusion surrounding the technical issues with EPC and based on the information in the notification letter, Missoula mistakenly believed it had already received payment from its June 2018 BEAR form and the total commitment had been paid in full.

In January 2019, however, Missoula realized it had not received any payments, so it opened a customer service case inquiring about the status of its June 2018 reimbursement request.¹⁹ On January 21, 2019, USAC responded that the invoice was denied due to a systems error and noted that the case had been escalated to customer service for a response.²⁰ However, a week later, USAC responded that the BEAR had not been processed due to a potential rule violation—Missoula’s failure to respond to a request for information—and that a commitment adjustment letter (COMAD) had been issued rescinding the District’s funding commitment.²¹ In response, Missoula stated that it had timely answered all USAC inquiries and requests for information.²² Missoula now files this request for a waiver of the appeal filing deadline.

¹⁸ Exhibit 13, USAC Form 472 BEAR Notification, November 16, 2018 at 6 (USAC November BEAR Notification) (“Reimbursement Request Decision Explanation: No Payment, Total Commitment Paid”).

¹⁹ Exhibit 8, Case in EPC re 471# 161048265, Case 262141 (EPC Case 262141) (Case Description: “We had submitted a Form 472 on June 18, 2018 and have not received payment.”).

²⁰ *Id.*

²¹ *Id.*; *see also*, Exhibit 2, USAC COMAD (rescinding the funding commitment in full).

²² Exhibit 8, EPC Case 262141.

II. THE COMMISSION SHOULD GRANT A WAIVER OF THE APPEAL DEADLINE, CONSISTENT WITH ITS PAST PRECEDENT AND THE PUBLIC INTEREST

Any of the Commission's rules may be waived if good cause is shown.²³ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.²⁴ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.²⁵

Consistent with its past precedent, the Commission should grant a waiver of section 54.720 of the Commission's rules to accept Missoula's appeal as timely. Commission precedent supports granting waivers for late-filed appeals when the appeal is necessary due to an error by USAC.²⁶ First, EPC did not properly capture the Category 2 funding request recipients of service, which Missoula has tried to diligently correct. Second, USAC opening an appeal and not clearly requesting information from Missoula—while Missoula was trying to correct the

²³ 47 C.F.R. § 1.3.

²⁴ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

²⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

²⁶ *Request for Review and/or Requests for Waiver of the Decisions of the Universal Service Administrator by Animas School District 6, et al.; Schools and Libraries Universal Service Support System Mechanism*, File Nos. SLD-427902 et al., CC Docket No. 02-6, Order, 26 FCC Rcd 16903, 16905, para. 4 (WCB 2011) (*Animas School District 6*) (granting waivers for late filed appeals because the applicant filed within a reasonable time of receiving actual notice or because the appeal would not have been necessary, but for an error by USAC); *Requests for Waiver and Review of the Decisions of the Universal Service Administrator by Ann Arbor Public Schools et al.; Schools and Libraries Universal Service Support System Mechanism*, CC Docket 02-6, Order, 25 FCC Rcd 17319, 17319, para. 1 (WCB 2010) (*Ann Arbor Public Schools et al.*) (granting waivers of appeal filing deadlines because the appeals involved errors by USAC); *Requests for Review of Decisions of the Universal Service Administrator by Savannah R-III School District; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 23 FCC Rcd 12053, n.30 (WCB 2008) (*Savannah R-III School District*) (finding good cause to waive section 54.720 of the Commission's rules that establishes deadlines for affected parties to seek review of decisions issued by USAC because the issue on appeal before the Commission should have been resolved with USAC before the petitioner resorted to filing an appeal).

issues using the Form 500—created confusion and led to Missoula not responding to USAC in a timely fashion. But for errors caused by USAC, exacerbated by the confusion surrounding the rollout of the EPC portal in Funding Year 2016, Missoula’s application would have been correct, and it would have timely responded to USAC’s request for further information, eliminating the need for any appeal.

Furthermore, the Commission has granted a waiver of its filing deadline rules in situations where an applicant did not receive adequate notice of a USAC decision.²⁷ Here, Missoula did not understand that its funding commitment had changed due to its failure to respond to a USAC inquiry Missoula never received.

Finally, the waiver is in the public interest because waiver of the filing deadline rule would further the goals of the E-rate program without undermining the purpose of the Commission’s rules. Therefore, Missoula respectfully requests a waiver of section 54.720 of the Commission’s rules and respectfully asks the Commission to remand this matter back to USAC to allow Missoula the opportunity to respond to USAC’s request for information and correct the recipients of service on its Funding Year 2016 application.

III. THE COMMISSION SHOULD GRANT MISSOULA’S WAIVER REQUEST BECAUSE AN APPEAL IS ONLY NECESSARY DUE TO AN ERROR BY USAC

First, Commission precedent supports granting waivers for late-filed appeals when the appeal is necessary due to an error by USAC.²⁸ For example, in *Animas School District 6*, the

²⁷ See, e.g., *Application for Review of a Decision of the Wireline Competition Bureau by Pribilof School District, St. Paul Island, Alaska, Schools and Libraries Universal Service Support Mechanism, File No. SLD-161061517*, CC Docket No. 02-6, Order, 33 FCC Rcd 8378 (2018) (*Pribilof School District*) (granting waiver of the Commission’s rules finding that EPC news feed notifications did not provide applicant with appropriate notice of USAC’s decision).

²⁸ *Animas School District 6*, 26 FCC Rcd at 16905, para. 4 (granting waivers for late filed appeals because the applicant filed within a reasonable time of receiving actual notice or because the appeal would not have been necessary, but for an error by USAC); *Ann Arbor Public Schools et al.*, 25 FCC Rcd at 17319,

Commission found USAC erred in its decision to deny funding because petitioners did not have a signed contract in place when the Form 471 was submitted.²⁹ Even though the appeal was filed late, the Bureau waived the rule to allow the appeal to be filed late, finding that if “USAC had not erred, the petitioners would not have had to file an appeal.”³⁰

Similarly, in this case, an appeal for a waiver would not be necessary but for errors caused by USAC. Despite multiple attempts, Missoula was unable to submit a Form 500 to correct the recipients of service on its Form 471 for individual FRN line items, because the EPC filing tool was not working properly.³¹ Missoula opened several customer service cases to correct the problem, but USAC closed the customer service cases without resolving the issue.³²

USAC’s second error was in not clearly identifying that it needed additional information from Missoula. In February 2018, Missoula received notification that USAC had initiated an “appeal” of the District’s application because the ROS allocation did not equal the FRN line

para. 1 (granting waivers of appeal filing deadlines because the appeals involved errors by USAC); *Savannah R-III School District*, 23 FCC Rcd at n.30 (finding good cause to waive section 54.720 of the Commission’s rules that establishes deadlines for affected parties to seek review of decisions issued by USAC because the issue on appeal before the Commission should have been resolved with USAC before the petitioner resorted to filing an appeal).

²⁹ *Animas School District 6*, 26 FCC Rcd at 16905, n.13.

³⁰ *Id.*

³¹ See Exhibit 4, EPC Case 203377 (The case thread reads: “I just uploaded a file that documents how the form 500 is not bringing up all of the entity details related to a single FNR line item.”); Exhibit 5, 202796 (The case descriptions states: “I am having problems completing a Form 500 for FRN 1699109896.”).

³² Exhibit 4, EPC Case 203377 (The case description states: “I have submitted case #202796 which was closed after a quick answer. I called USAC as advised. A new case was created # 202837 and I was to e-mail some screen shots. Those were sent via e-mail as the support person said I should do. When I went in today to check on that 2nd case, I found it too was closed, though no resolution or help was provided. Please help as the information coming up in the form 500 filing tool is not working properly for this School District.”). The District opened the following customer service cases concerning Form 500 issues: 203377, 202796, 202837. See *id.*

amounts on the District's FCC Form 471.³³ Additionally, the notification stated that no action was required by Missoula.³⁴ Relying on this message from USAC, Missoula believed it did not need to take any action until it received further notification from USAC. Subsequently, however, USAC rescinded Missoula's FY2016 funding in full for failure to respond to a request for information that Missoula never received.³⁵

USAC should never have had to create an "appeal." USAC's "appeal" and investigation would not have been necessary if: 1.) the EPC portal had been working properly and Missoula had been able to submit the Form 500; 2.) USAC had properly resolved Missoula's multiple customer service cases; or 3.) the issue had been resolved through better communication between USAC and the District.

Second, USAC should have provided adequate notice of its request for information from the District. The Commission has granted a waiver of its filing deadline rules in situations where an applicant did not receive adequate notice of a USAC decision.³⁶ Adequate notice is important, especially in situations that establish absolute deadlines and where the failure to meet those deadlines can result in the complete loss of funding.

USAC rescinded Missoula's funding because Missoula failed to timely respond to USAC's request for information; specifically, Missoula did not authorize "sufficient

³³ Exhibit 6, ROS Allocation.

³⁴ *Id.*

³⁵ Exhibit 11, USAC RFCDL at 5 ("This appeal has been cancelled because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget."); Exhibit 2, USAC COMAD ("Failure to timely respond to the Administrator's request for information.").

³⁶ See, e.g., *Pribilof School District*, 33 FCC Rcd 8378 (granting waiver of the Commission's rules finding that EPC news feed notifications did not provide applicant with appropriate notice of USAC's decision).

modifications to the Category Two funding requests.”³⁷ However, Missoula did not have adequate notice of USAC’s request for information seeking authorizations from the District. Instead of clearly identifying that it was requesting information, USAC’s February 12, 2018, message stated that no action was required on Missoula’s part.³⁸ If USAC asked Missoula a question at that time, it was not clear where the question was. Missoula did not realize that its 2016 funding commitment had been rescinded in full until January 2019, when it inquired about the status of its BEAR form.³⁹

Contrary to USAC’s statement that Missoula failed to respond to its requests for information, Missoula believed it had responded to all USAC inquiries.⁴⁰ When attempting to file its Form 500 and correct data errors, Missoula made several attempts to obtain guidance from USAC, opening numerous customer service cases to address the issue.

As detailed above, an appeal for a waiver would not be necessary but for errors caused by USAC. Accordingly, and consistent with Commission precedent, Missoula requests that the Commission waive its rules to accept its appeal filed with the Commission as timely and remand this application back to USAC to allow Missoula and USAC to work together to allocate the funding requests to the proper location.

³⁷ Exhibit 11, USAC RFCDL at 5; Exhibit 2, USAC COMAD.

³⁸ Exhibit 6, ROS Allocation.

³⁹ USAC’s statement of “no payment; total commitment paid,” on the BEAR notification letter dated November 16, 2018, seemed to confirm that Missoula had received payment on the BEAR invoice it had submitted months earlier. Because Missoula did not have any additional invoices to submit on that funding request, it did not believe it needed to take any action. It was only later that Missoula realized that USAC had not disbursed any funds.

⁴⁰ Exhibit 8, EPC Case 262141 (Missoula response on March 1, 2019).

IV. A WAIVER OF THE COMMISSION'S RULES IS IN THE PUBLIC INTEREST

As set out above, Missoula is entitled to funding for eligible E-rate services as requested. A waiver would further the goals of the E-rate program without undermining the purpose of the Commission's rules and would thus be in the public interest. As explained above, Missoula adhered to the E-rate program requirements and received a funding commitment of \$490,773.47 for Funding Year 2016.⁴¹ If the Commission upholds USAC's decision, the result will be a denial of all Category Two funding because EPC could not implement Missoula's changes regarding the amounts of funding that each school was eligible for.

Missoula did not make a substantive error; in fact, Missoula was diligent in trying to correct the amounts of funding associated with each of its schools. As mentioned above, Funding Year 2016 was the first year E-rate applicants were required to use the EPC portal. Many applicants faced challenges with their applications due to unexpected issues with the rollout of the system, issues that were beyond the applicants' control.⁴² Despite experiencing multiple technical errors with EPC, Missoula timely answered all USAC inquiries and requests for information that it actually received.⁴³ Given the unusual facts of this situation—including complications and technical errors from the EPC portal and missing notifications of USAC correspondence—Missoula should not be faulted for relying on USAC's guidance that no further

⁴¹ See Exhibit 2, USAC COMAD at 3; Exhibit 3, FRN Status Tool with RFCDL.

⁴² See *Pribilof School District*, 33 FCC Rcd 8378 (granting waiver of the Commission's rules finding that EPC news feed notifications did not provide applicant with appropriate notice of USAC's decision). For example, in *Pribilof School District*, the Commission granted a waiver of the appeal filing deadline in section 54.720(a) of the Commission's rules. In that case, the Commission found the applicant did not have notice of a USAC decision published through the EPC news feed in Funding Year 2016. Therefore, the Commission found the applicant did not have notice of the relevant filing deadline to appeal that USAC decision. *Id.* at paras. 3, 9-11.

⁴³ Exhibit 8, EPC Case 262141.

action was required.⁴⁴ Missoula was unaware of USAC's outstanding request for additional information. Missoula never received such a request and it had already successfully submitted its BEAR form. USAC has an obligation to work with applicants in good faith to resolve issues and answer questions before denying an applicant's funding.⁴⁵ Further, USAC has not suggested any concerns about waste, fraud, or abuse in this case, and in fact there was no waste, fraud, or abuse or bad faith on the part of Missoula. It does not serve the goals of the E-rate program or the public interest to withhold all funding from Missoula simply because Missoula did not receive and, thus, was unable to respond to a request for information.

⁴⁴ Exhibit 6, ROS Allocation ("USAC discovered that the Recipient of Service (ROS) allocation does not equal the Funding Request Number (FRN) line amounts on your FCC Form 417. Therefore, USAC has created an appeal record on your behalf to review your application. After our review is complete, you will receive a Revised Funding Commitment Decision Letter. There is no action required by you at this time.").

⁴⁵ See *Requests for Waiver of Decisions of the Universal Service Administrator by Alpaugh Unified School District, et al.*, CC Docket No. 02-6, Order, 22 FCC Rcd 6035, n.14 (2007) (noting that USAC shall work with applicants in good faith to submit necessary documentation).

V. CONCLUSION

For the foregoing reasons, Missoula therefore respectfully requests that the Commission waive the Commission's rules to the extent necessary to grant the requested relief and remand this matter to USAC to allow Missoula the opportunity to respond to USAC's request for information.

Respectfully submitted,

/s/ Fred Brakeman

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May 13, 2019

STATE OF MONTANA)
) SS
COUNTY OF MISSOULA)

1. That I am the Accounting Supervisor for the Missoula County Public Schools. I was hired by the District for that position in August, 1994.
2. That I have read the foregoing **appeal** and avow the information stated therein is true and correct to the best of my knowledge and belief.

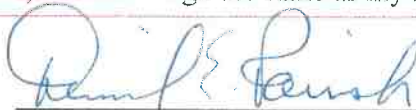
Donald E. Fensch

Daniel E. Parrish
Missoula **County** Public Schools
215 South Sixth Street West
Missoula, MT 59801
406-728-2400

VERIFICATION

STATE OF MONTANA)
) SS
COUNTY OF MISSOULA)

COMES NOW, Daniel E. Parrish, and being first duly sworn upon my oath, state that I have read the foregoing Affidavit, and that the facts contained therein are true and correct to the best of my knowledge, information and belief, and that I sign the same as my free act and deed.

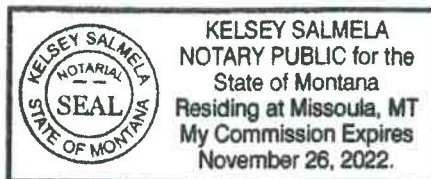


Daniel E. Parrish

On this 10TH day of May, 2019, before me, a Notary Public in and for said state, personally appeared Daniel E. Parrish, known to me to be the **person** who executed the within Affidavit, and acknowledged to me that he **executed** the same for the purposes therein stated and that he **executed** the same as his free act and deed.


Notary Public

My Commission Expires: 11/26/2022



CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document will be sent via email to the Schools and Libraries Division, Universal Service Administrative Company at the Appeals@USAC.org address.

/s/ Fred Brakeman

Fred Brakeman

List of Exhibits

Affidavit of Daniel E. Parrish

- Exhibit 1 Missoula County Public Schools FCC Form 471, No. 161048265, filed May 26, 2016 (Missoula Form 471).
- Exhibit 2 USAC Commitment Adjustment Letter, October 17, 2018 (USAC COMAD).
- Exhibit 3 FRN Status Tool with Revised Funding Commitment Decision, August 16, 2018 (FRN Status Tool with RFCDL).
- Exhibit 4 Case in EPC re 471# 161048265, Case 203377 (EPC Case 203377).
- Exhibit 5 Case in EPC re 471# 161048265, Case 202796 (EPC Case 202796).
- Exhibit 6 ROS Allocation Mismatch - #89515, February 12, 2018 (ROS Allocation).
- Exhibit 7 Case in EPC re 471# 161048265, Case 233709 (EPC Case 233709).
- Exhibit 8 Case in EPC re 471# 161048265, Case 262141 (EPC Case 262141).
- Exhibit 9 Case in EPC re 471# 161048265, Case 239970 (EPC Case 239970).
- Exhibit 10 Missoula Category Two FRN #1699109896.001 Discrepancies, April 11, 2018 (Missoula Category Two Discrepancies).
- Exhibit 11 USAC Revised Funding Commitment Decision Letter, August 15, 2018 (USAC RFCDL).
- Exhibit 12 Missoula Bill Entity Applicant Reimbursement Form FCC Form 472 No. 2822715, filed June 18, 2018 (Missoula BEAR Form).
- Exhibit 13 USAC Form 472 BEAR Notification, November 16, 2018 (USAC November BEAR Notification).

EXHIBIT 1



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname FORM 471-Cat_2 FY17

Application Number 161048265

Funding Year 2016

Category of Service Category 2

Billed Entity

MISSOULA COUNTY HIGH SCHOOLS
215 S 6TH ST W MISSOULA MT 59801 - 4028
406-728-2400

Contact Information

Dan Parrish
406-728-2400
dparrish@mcps.k12.mt.us

Billed Entity Number 135105

FCC Registration Number 0001628148

Applicant Type School District

Holiday/Summer Contact Information Same

Entity Information

School District Entity - Details

| BEN | Name | Urban/ Rural | State LEA ID | State School ID | NCES Code | School District Attributes | Endowment |
|--------|------------------------------|-----------------|-----------------|-----------------------|--------------|-------------------------------|-----------|
| 135105 | MISSOULA COUNTY HIGH SCHOOLS | Urban | | | | Public School District | None |

Related Entity Information

Related Child School Entity - Details

| BEN | Name | Urban/ Rural | State LEA ID | State School ID | NCES Code | Alternative Discount | School Attributes | Endowment |
|-------|--------------------------------|-----------------|-----------------|--------------------|-----------|-------------------------|---|-----------|
| 67901 | DICKINSON ELEMENTARY SCHOOL | Urban | | | | None | Adult Education; Public School | None |
| 67903 | FRANKLIN ELEMENTARY SCHOOL | Urban | | | | | Public School; New Construction School | None |
| 67907 | HELLGATE HIGH SCHOOL | Urban | | | | None | Public School | None |
| 67908 | PAXSON ELEMENTARY SCHOOL | Urban | | | | None | Public School | None |
| 67909 | WASHINGTON MIDDLE SCHOOL | Urban | | | | None | Public School | None |
| 67910 | SENTINEL HIGH SCHOOL | Urban | 0584 | 1433 | | None | Public School | None |

| BEN | Name | Urban/ Rural | State LEA ID | State School ID | NCES Code | Alternative Discount | School Attributes | Endowment |
|----------|----------------------------------|-----------------|-----------------|--------------------|-----------|-------------------------|-------------------|-----------|
| 67911 | RUSSELL ELEMENTARY SCHOOL | Urban | | | | | Public School | None |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | Urban | 0583 | 0774 | | None | Public School | None |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | Urban | | | | None | Public School | None |
| 67914 | LOWELL ELEMENTARY SCHOOL | Urban | | | | | Public School | None |
| 67922 | COLD SPRINGS ELEMENTARY SCHOOL | Urban | 0583 | 1443 | | None | Public School | None |
| 67923 | MEADOW HILL MIDDLE SCHOOL | Urban | 0583 | 1491 | | None | Public School | None |
| 67924 | CHIEF CHARLO ELEMENTARY SCHOOL | Urban | | | | None | Public School | None |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | Urban | | | | | Public School | None |
| 67928 | BIG SKY HIGH SCHOOL | Urban | 0584 | 1592 | | None | Public School | None |
| 67930 | PORTER MIDDLE SCHOOL | Urban | | | | | Public School | None |
| 68019 | SEELEY SWAN HIGH SCHOOL | Rural | | | | None | Public School | None |
| 16027875 | WILLARD ALTERNATIVE HIGH SCHOOL | Urban | | | | None | Public School | None |
| 67917 | MOUNT JUMBO ELEMENTARY SCHOOL | Urban | | | | | Public School | None |

Related Child School Entity - Discount Rate Calculation Details

| BEN | Name | Urban/ Rural | Number of Students | Students Count Based on Estimate | CEP Percentage |
|----------|----------------------------------|-----------------|-----------------------|--|-------------------|
| 67901 | DICKINSON ELEMENTARY SCHOOL | Urban | 1800 | N/A | |
| 67903 | FRANKLIN ELEMENTARY SCHOOL | Urban | 243 | N/A | 51.63% |
| 67907 | HELLGATE HIGH SCHOOL | Urban | 1139 | N/A | |
| 67908 | PAXSON ELEMENTARY SCHOOL | Urban | 423 | N/A | |
| 67909 | WASHINGTON MIDDLE SCHOOL | Urban | 640 | N/A | |
| 67910 | SENTINEL HIGH SCHOOL | Urban | 1104 | N/A | |
| 67911 | RUSSELL ELEMENTARY SCHOOL | Urban | 387 | N/A | 52.71% |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | Urban | 498 | N/A | |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | Urban | 479 | N/A | |
| 67914 | LOWELL ELEMENTARY SCHOOL | Urban | 291 | N/A | 56.36% |
| 67922 | COLD SPRINGS ELEMENTARY SCHOOL | Urban | 486 | N/A | |
| 67923 | MEADOW HILL MIDDLE SCHOOL | Urban | 496 | N/A | |
| 67924 | CHIEF CHARLO ELEMENTARY SCHOOL | Urban | 437 | N/A | |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | Urban | 381 | N/A | 48.03% |
| 67928 | BIG SKY HIGH SCHOOL | Urban | 1005 | N/A | |
| 67930 | PORTER MIDDLE SCHOOL | Urban | 456 | N/A | 41.28% |
| 68019 | SEELEY SWAN HIGH SCHOOL | Rural | 107 | N/A | |
| 16027875 | WILLARD ALTERNATIVE HIGH SCHOOL | Urban | 172 | N/A | |
| 67917 | MOUNT JUMBO ELEMENTARY SCHOOL | Urban | 243 | N/A | 51.63% |

Related School District NIFs

| School District BEN | School District Name | NIF BEN | NIF Name |
|---------------------|------------------------------|----------|------------------------------|
| 135105 | MISSOULA COUNTY HIGH SCHOOLS | 16084626 | JEFFERSON CENTER |
| 135105 | MISSOULA COUNTY HIGH SCHOOLS | 16084627 | MCPS BUSINESS BUILDING |
| 135105 | MISSOULA COUNTY HIGH SCHOOLS | 16084628 | MCPS ADMINISTRATION BUILDING |

Discount Rate

| School District Enrollment | School District NSLP Count | School District NSLP Percentage | School District Urban/Rural Status | Category One Discount Rate | Category Two Discount Rate | Voice Discount Rate |
|----------------------------|----------------------------|---------------------------------|------------------------------------|----------------------------|----------------------------|---------------------|
| 9178 | 3834 | 42.0% | Urban | 60% | 60% | 20% |

Funding Request for FRN #1699109896

Funding Request Nickname: Bldg_Wiring_FY17

Service Type: Internal Connections

Agreement Information - Contract

Contract Number

User-entered Establishing FCC Form 470# 983410001278699

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Award Date April 16, 2015

How many bids were received for this contract? 1

What is the service start date? July 01, 2016

Account Number

Service Provider KGH Corp. (SPN: 143046895)

Based on State Master Contract? No

Based on a multiple award schedule? No

Includes Voluntary Extensions? No

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? July 31, 2017

| Document Name | Document Description |
|-----------------------------------|---|
| WiringAgrmt-WeConnect 4-16-15.pdf | Contract With WeConnect for Building Wiring |

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Building Wiring for buildings of the District to enhance wired and wireless access.

Line Item # 1699109896.001**Product and Service Details****Type of Internal Connection** Cabling/Connectors**Type of Product**

Cabling

Make Other**Model**CAT 6 SOLID COPPER 22-24
AWG 6 UTP CABLE ANSI/TIE/
EIA -568-B.2-10 COMPLIANT**Is installation included in Price?**No**Is the hardware for this FRN line**No
item leased?**Cost Calculation for FRN Line Item # 1699109896.001**

| Monthly Cost | | One-Time Cost | |
|---|----------|--|----------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$65.72 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$12.75 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$52.97 |
| Monthly Quantity | x 0 | One-time Quantity | x 4569 |
| Units | 0 | Total Eligible One-time Costs | = \$242,019.93 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$242,019.93 |
| | | Pre-Discout Extended Eligible Line Item Cost | = \$242,019.93 |

Recipients of Services

| BEN | Name | Amount |
|-------|---------------------------|-------------|
| 67907 | HELLGATE HIGH SCHOOL | \$60,980.06 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$24,588.64 |
| 67910 | SENTINEL HIGH SCHOOL | \$67,293.35 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$21,706.42 |
| 67928 | BIG SKY HIGH SCHOOL | \$67,451.46 |

Line Item # 1699109896.002**Product and Service Details****Type of Internal Connection** Cabling/Connectors**Type of Product**

Cabling

Make Other**Model**Cat 6 Solid Copper 22-24 Awg
6 UTP Cable Ansi/Tia/Eia-568-
B.2-10 Complaint-175'**Is installation included in Price?**No**Is the hardware for this FRN line**No
item leased?**Cost Calculation for FRN Line Item # 1699109896.002**

| Monthly Cost | | One-Time Cost | |
|-----------------------------|--------|--------------------|---------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$68.76 |

| | |
|---|----------|
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 |
| Monthly Quantity | x 0 |
| Units | 0 |
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |
| | |

| | |
|---|----------------|
| One-time Ineligible Unit Costs | - \$11.05 |
| One-time Eligible Unit Cost | = \$57.71 |
| One-time Quantity | x 1938 |
| Total Eligible One-time Costs | = \$111,841.98 |
| Summary | |
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$111,841.98 |
| Pre-Discount Extended Eligible Line Item Cost | = \$111,841.98 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|-------------|
| 67908 | PAXSON ELEMENTARY SCHOOL | \$21,138.86 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$21,859.84 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$23,541.40 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$13,956.30 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$31,355.27 |

Line Item # 1699109896.005

Product and Service Details

Type of Internal Connection Cabling/Connectors

Type of Product Cabling

Make Other

Model Patch Panels 48 Port X-Max 6 UTP MX6-PNL-U48(X)

Is installation included in Price?No

Is the hardware for this FRN line item leased?No

Cost Calculation for FRN Line Item # 1699109896.005

| | |
|---|----------|
| Monthly Cost | |
| Monthly Recurring Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 |
| Monthly Quantity | x 0 |
| Units | 0 |
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |
| | |

| | |
|---|---------------|
| One-Time Cost | |
| One-time Unit Cost | \$292.00 |
| One-time Ineligible Unit Costs | - \$53.87 |
| One-time Eligible Unit Cost | = \$238.13 |
| One-time Quantity | x 145 |
| Total Eligible One-time Costs | = \$34,528.85 |
| Summary | |
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$34,528.85 |
| Pre-Discount Extended Eligible Line Item Cost | = \$34,528.85 |

Recipients of Services

| BEN | Name | Amount |
|-------|----------------------|------------|
| 67907 | HELLGATE HIGH SCHOOL | \$5,740.22 |

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67908 | PAXSON ELEMENTARY SCHOOL | \$2,215.03 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$2,391.40 |
| 67910 | SENTINEL HIGH SCHOOL | \$6,304.05 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$2,418.13 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$2,953.46 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$2,455.03 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$2,364.45 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$1,472.98 |
| 67928 | BIG SKY HIGH SCHOOL | \$6,214.10 |

Line Item # 1699109896.007

Product and Service Details

Type of Internal Connection Cabling/Connectors

Type of Product Cabling

Make Other

Model 5',7', & 10' Cat 6 Patch Cable

Is installation included in Price?No

Is the hardware for this FRN lineNo
item leased?

Cost Calculation for FRN Line Item # 1699109896.007

| Monthly Cost | | One-Time Cost | |
|---|----------|---|---------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$6.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$1.11 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$4.89 |
| Monthly Quantity | x 0 | One-time Quantity | x 6632 |
| Units | 0 | Total Eligible One-time Costs | = \$32,430.48 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$32,430.48 |
| | | Pre-Discount Extended Eligible Line Item Cost | = \$32,430.48 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67907 | HELLGATE HIGH SCHOOL | \$5,454.00 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$2,124.00 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$2,136.88 |
| 67910 | SENTINEL HIGH SCHOOL | \$6,060.00 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$2,226.00 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$2,736.00 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$2,376.00 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$2,015.60 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$1,362.00 |
| 67928 | BIG SKY HIGH SCHOOL | \$5,940.00 |

Line Item # 1699109896.008**Product and Service Details****Type of Internal Connection** Cabling/Connectors**Type of Product**

Connectors

Make Other**Model**

FACEPLATES MAX(4 PORT) MX-FP-S-04-SS-20

Is installation included in Price?No**Is the hardware for this FRN line**No
item leased?**Cost Calculation for FRN Line Item # 1699109896.008**

| Monthly Cost | |
|---|----------|
| Monthly Recurring Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 |
| Monthly Quantity | x 0 |
| Units | 0 |
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |

| One-Time Cost | |
|---|--------------|
| One-time Unit Cost | \$2.10 |
| One-time Ineligible Unit Costs | - \$0.39 |
| One-time Eligible Unit Cost | = \$1.71 |
| One-time Quantity | x 2344 |
| Total Eligible One-time Costs | = \$4,008.24 |
| Summary | |
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$4,008.24 |
| Pre-Discourt Extended Eligible Line Item Cost | = \$4,008.24 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|----------|
| 67907 | HELLGATE HIGH SCHOOL | \$680.18 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$219.14 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$268.15 |
| 67910 | SENTINEL HIGH SCHOOL | \$921.04 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$227.73 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$290.79 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$257.27 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$232.57 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$161.42 |
| 67928 | BIG SKY HIGH SCHOOL | \$749.95 |

Line Item # 1699109896.009**Product and Service Details****Type of Internal Connection** Racks**Type of Product**

Racks & Cabinets

Make Other**Model**

SURFACE MOUNT RACEWAY

Is installation included in Price?No**Is the hardware for this FRN line**No
item leased?

Cost Calculation for FRN Line Item # 1699109896.009

| Monthly Cost | | One-Time Cost | |
|---|----------|---|--------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$1.60 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$0.29 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$1.31 |
| Monthly Quantity | x 0 | One-time Quantity | x 4554 |
| Units | 0 | Total Eligible One-time Costs | = \$5,965.74 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$5,965.74 |
| | | Pre-Discourt Extended Eligible Line Item Cost | = \$5,965.74 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67908 | PAXSON ELEMENTARY SCHOOL | \$842.86 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$627.25 |
| 67910 | SENTINEL HIGH SCHOOL | \$1,579.58 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$414.06 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$421.44 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$252.23 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$310.09 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$168.15 |
| 67928 | BIG SKY HIGH SCHOOL | \$1,350.08 |

Line Item # 1699109896.010

Product and Service Details

| | | | |
|------------------------------------|-------|--|---------------------|
| Type of Internal Connection | Racks | Type of Product | Racks & Cabinets |
| Make | Other | Model | WALL OR FLOOR RACKS |
| Is installation included in Price? | No | Is the hardware for this FRN line item leased? | No |

Cost Calculation for FRN Line Item # 1699109896.010

| Monthly Cost | | One-Time Cost | |
|---|----------|--------------------------------|---------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$525.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$94.38 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$430.62 |
| Monthly Quantity | x 0 | One-time Quantity | x 36 |
| Units | 0 | Total Eligible One-time Costs | = \$15,502.32 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| | | Total Eligible Recurring Costs | \$0.00 |

| | |
|--------------------------------|----------|
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |
| | |

| | |
|--|---------------|
| Total Eligible One-time Costs | + \$15,502.32 |
| Pre-Discout Extended Eligible Line Item Cost | = \$15,502.32 |
| | |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67907 | HELLGATE HIGH SCHOOL | \$1,965.83 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$750.14 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$823.27 |
| 67910 | SENTINEL HIGH SCHOOL | \$2,126.83 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$869.53 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$885.03 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$882.80 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$813.99 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$637.28 |
| 67928 | BIG SKY HIGH SCHOOL | \$5,747.62 |

Line Item # 1699109896.011

Product and Service Details

Type of Internal Connection Cabling/Connectors

Type of Product Cabling

Make Other

Model Cat 6 Solid Copper 22-24 AWG
6 UTP CAB:E ANSI/TIA/EIA-568-B.2-10 Complaint- 150'

Is installation included in Price?No

Is the hardware for this FRN lineNo
item leased?

Cost Calculation for FRN Line Item # 1699109896.011

| Monthly Cost | |
|---|----------|
| Monthly Recurring Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 |
| Monthly Quantity | x 0 |
| Units | 0 |
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |
| | |

| One-Time Cost | |
|--|--------------|
| One-time Unit Cost | \$57.43 |
| One-time Ineligible Unit Costs | - \$8.55 |
| One-time Eligible Unit Cost | = \$48.88 |
| One-time Quantity | x 59 |
| Total Eligible One-time Costs | = \$2,883.92 |
| Summary | |
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$2,883.92 |
| Pre-Discout Extended Eligible Line Item Cost | = \$2,883.92 |
| | |

Recipients of Services

| BEN | Name | Amount |
|-------|---------------------|------------|
| 67928 | BIG SKY HIGH SCHOOL | \$2,883.92 |

Line Item # 1699109896.012**Product and Service Details****Type of Internal Connection** Cabling/Connectors**Type of Product**

Connectors

Make Other**Model**RJ45 6UTP OUTLET Z-MAX 6
UTP MX6-20**Is installation included in Price?**No**Is the hardware for this FRN line**No
item leased?**Cost Calculation for FRN Line Item # 1699109896.012**

| Monthly Cost | |
|---|----------|
| Monthly Recurring Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 |
| Monthly Quantity | x 0 |
| Units | 0 |
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |

| One-Time Cost | |
|---|---------------|
| One-time Unit Cost | \$5.25 |
| One-time Ineligible Unit Costs | - \$0.97 |
| One-time Eligible Unit Cost | = \$4.28 |
| One-time Quantity | x 6496 |
| Total Eligible One-time Costs | = \$27,802.88 |
| Summary | |
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$27,802.88 |
| Pre-Discount Extended Eligible Line Item Cost | = \$27,802.88 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67907 | HELLGATE HIGH SCHOOL | \$4,772.25 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$1,858.50 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$1,964.09 |
| 67910 | SENTINEL HIGH SCHOOL | \$5,288.95 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$1,947.75 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$2,393.79 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$2,101.91 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$1,876.06 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$401.87 |
| 67928 | BIG SKY HIGH SCHOOL | \$5,197.71 |

Line Item # 1699109896.013**Product and Service Details****Type of Internal Connection** Miscellaneous**Type of Product**Installation, Activation, & Initial
Configuration**Make** Other**Model**

LABOR

Is installation included in Price?Yes**Is the hardware for this FRN line**No
item leased?

Cost Calculation for FRN Line Item # 1699109896.013

| Monthly Cost | | One-Time Cost | |
|---|----------|---|----------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$516,824.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$133,392.98 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$383,431.02 |
| Monthly Quantity | x 0 | One-time Quantity | x 1 |
| Units | 0 | Total Eligible One-time Costs | = \$383,431.02 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$383,431.02 |
| | | Pre-Discount Extended Eligible Line Item Cost | = \$383,431.02 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|-------------|
| 67907 | HELLGATE HIGH SCHOOL | \$75,808.72 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$25,285.71 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$27,605.43 |
| 67910 | SENTINEL HIGH SCHOOL | \$72,742.42 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$26,085.94 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$31,051.28 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$29,426.75 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$24,852.30 |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | \$17,907.78 |
| 67928 | BIG SKY HIGH SCHOOL | \$52,664.69 |

Line Item # 1699109896.014

Product and Service Details

| | | | |
|------------------------------------|---------------|--|---|
| Type of Internal Connection | Miscellaneous | Type of Product | Installation, Activation, & Initial Configuration |
| Make | Other | Model | PERMIT |
| Is installation included in Price? | No | Is the hardware for this FRN line item leased? | No |

Cost Calculation for FRN Line Item # 1699109896.014

| Monthly Cost | | One-Time Cost | |
|---|----------|--------------------------------|---------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$30,000.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$5,792.41 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$24,207.59 |
| Monthly Quantity | x 0 | One-time Quantity | x 1 |
| Units | 0 | Total Eligible One-time Costs | = \$24,207.59 |

| | |
|--|----------|
| Total Monthly Eligible Recurring Costs | = \$0.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$0.00 |
| | |

Summary

| | |
|---|---------------|
| Total Eligible Recurring Costs | \$0.00 |
| Total Eligible One-time Costs | + \$24,207.59 |
| Pre-Discount Extended Eligible Line Item Cost | = \$24,207.59 |

Recipients of Services

| BEN | Name | Amount |
|-------|------------------------------|------------|
| 67907 | HELLGATE HIGH SCHOOL | \$5,504.33 |
| 67908 | PAXSON ELEMENTARY SCHOOL | \$1,938.57 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$1,889.60 |
| 67910 | SENTINEL HIGH SCHOOL | \$6,397.47 |
| 67911 | RUSSELL ELEMENTARY SCHOOL | \$1,987.50 |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | \$2,612.94 |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | \$2,101.90 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$1,775.28 |

FRN Calculation for FRN #1699109896

| Monthly Charges | |
|---|----------|
| Total Monthly Recurring Charges | \$0.00 |
| Total Monthly Ineligible Charges | - \$0.00 |
| Total Monthly Eligible Charges | = \$0.00 |
| Total Number of Months of Service | x 12 |
| Total Eligible Pre-Discount Recurring Charges | = \$0.00 |

| Total Requested Amount | |
|---|----------------|
| Total Eligible Pre-Discount Recurring Charges | \$0.00 |
| Total Eligible Pre-Discount One-Time Charges | + \$884,622.95 |
| Total Pre-Discount Charges | = \$884,622.95 |
| Discount Rate | 60% |
| Funding Commitment Request | = \$530,779.58 |

| One-Time Charges | |
|--|----------------|
| Total One-Time Charges | \$1,131,088.73 |
| Total Ineligible One-Time Charges | - \$246,465.78 |
| Total Eligible Pre-Discount One-Time Charges | = \$884,622.95 |

Connectivity Questions

District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Internet access on a building-by-building basis)? Yes

Download Speed 400.00

Download Speed Units Mbps

Upload Speed 400.00

Upload Speed Units Mbps

Per Entity Basis Questions

Entity Name MISSOULA COUNTY HIGH SCHOOLS

Entity Number 135105

| BEN | Entity Name | Download | Units | Upload | Units | Connection | Wifi Sufficient | Barriers to Robust Network |
|-------|--------------------------------|----------|-------|--------|-------|----------------|-----------------|--|
| 67901 | DICKINSON ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67903 | FRANKLIN ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67907 | HELLGATE HIGH SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | No barriers |
| 67908 | PAXSON ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67909 | WASHINGTON MIDDLE SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67910 | SENTINEL HIGH SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | No barriers |
| 67911 | RUSSELL ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67912 | LEWIS & CLARK ELEMENTARY SCH | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67913 | RATTLESNAKE MIDDLE SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67914 | LOWELL ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67917 | MOUNT JUMBO ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67922 | COLD SPRINGS ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67923 | MEADOW HILL MIDDLE SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67924 | CHIEF CHARLO ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67925 | HAWTHORNE ELEMENTARY SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 67928 | BIG SKY HIGH SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | No barriers |

| BEN | Entity Name | Download | Units | Upload | Units | Connection | Wifi Sufficient | Barriers to Robust Network |
|----------|---------------------------------|----------|-------|--------|-------|----------------|-----------------|--|
| 67930 | PORTER MIDDLE SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 68019 | SEELEY SWAN HIGH SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |
| 16027875 | WILLARD ALTERNATIVE HIGH SCHOOL | 400.00 | Mbps | 400.00 | Mbps | Fixed Wireless | Never | Broadband connection speed to building is too slow |

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

| Summary | |
|---|--------------|
| Total funding year pre-discount eligible amount on this FCC Form 471 | \$884,632.64 |
| Total funding commitment request amount on this FCC Form 471 | \$530,779.58 |
| Total applicant non-discount share of the eligible amount | \$353,853.06 |
| Total budgeted amount allocated to resources not eligible for E-rate support | \$0.00 |
| Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts | \$353,853.06 |
| Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year? | No |
| Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share? | No |

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the

statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

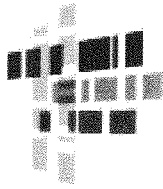
Authorized Person

| | | | |
|-----------------|--|------------------|-------------------------|
| Title: | Accounting Supervisor | Name: | Dan Parrish |
| Phone: | 406-728-2400 | Email: | dparrish@mcps.k12.mt.us |
| Address: | 215 S 6TH ST W MISSOULA MT 59801 - 4028 | Employer: | Dan Parrish |

Certified Timestamp

26-May-2016 14:22:36 EDT

EXHIBIT 2



Universal Service
Administrative Co.

Commitment Adjustment Letter

Dan Parrish
MISSOULA COUNTY PUBLIC
SCHOOLS
215 S 6TH ST W
MISSOULA, MT 59801

10/17/2018

Our review of your Schools and Libraries Universal Service Support Program (or E-rate) funding request has determined funds were committed in violation of Federal Communications Commission (FCC) rules. You have 60 days from the date of this letter to appeal the following decision(s). For more detailed information see below.

Total commitment adjustment:\$490,773.47

Total amount to be recovered:\$0.00

| FCC Form 471 | FRN | Commitment adjustment | Total amount to be recovered | Explanation(s) | Party to recover from |
|--------------|------------|-----------------------|------------------------------|--|-----------------------|
| 161048265 | 1699109896 | \$490,773.47 | \$0.00 | Failure to timely respond to the Administrator's request for information | BEN |

See Attached Adjustment Report for more information on the specific FRNs and Explanations listed above.

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) and provides information on how to appeal this decision.

This is NOT a bill. If disbursed funds need to be recovered, USAC will issue a Demand Payment Letter. The debt referenced in the Demand Payment Letter will be due within 30 days of that letter's date. Failure to pay the debt may result in interest, late payment fees, and administrative charges and will invoke the FCC's "Red Light Rule."

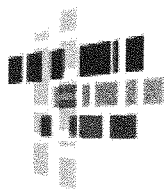
FCC's Red Light Rule

The FCC Red Light Rule requires USAC to dismiss pending FCC Form 471 applications, appeals, and invoices or to net disbursements offsetting the debt if the entity responsible for paying the outstanding debt owed to the FCC has not paid the debt or made satisfactory arrangements to pay the debt within 30 days of the Demand Payment Letter. For information on the Red Light Rule, see

<https://www.fcc.gov/licensing-databases/fees/debt-collection-improvement-act-implementation>.

To Appeal This Decision

If you wish to contest any part of this letter, you must first file an appeal with USAC to seek review of the decision. Parties that have filed an appeal with USAC and received an adverse decision may, if they choose, appeal USAC's decision to the FCC. Parties seeking a waiver of a codified FCC rule should file a request for waiver directly with the FCC because



Universal Service Administrative Co.

USAC cannot waive FCC rules. Your appeal to USAC or waiver request to the FCC must be filed within 60 days of the date of this letter.

All appeals filed with USAC must be filed in EPC by selecting "Appeal" from the menu in the top right hand corner of your landing page and providing the requested information.

Your appeal should include the following information. (Because you file the appeal through your EPC account, the system will automatically fill in some of these components for you).

- 1) Name, address, telephone number, and email address for the contact person for this appeal.
- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Commitment Adjustment Letter) and the decision you are appealing:
 - a. Appellant name;
 - b. Applicant name and service provider name, if different from appellant;
 - c. Applicant BEN and Service Provider Identification Number (SPIN);
 - d. FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC;
 - e. "Commitment Adjustment Letter," AND the exact text or the decision that you are appealing.
- 3) Identify the problem and the reason for the appeal and explain precisely the relief sought. Please keep your appeal to the point, and provide supporting documentation. Be sure to keep a copy of your entire appeal, including any correspondence and documentation. A copy will automatically be saved for you in EPC. USAC will reply to your appeal submission to confirm receipt.

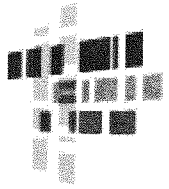
For more information on submitting an appeal to USAC including step by step instructions on how to file the appeal through EPC, please see "Appeals" in the Schools and Libraries section of the USAC website.

As mentioned, parties seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may file a request for waiver or appeal USAC's decision to the FCC. Waiver requests or appeals to the FCC must be made within 60 days of the issuance of USAC's decision and include all of the information referenced above for appeals to USAC.

The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193.

For more information about submitting waiver requests or appeals to the FCC, including options to submit the waiver request or appeal via U.S. mail or hand delivery, visit the FCC's website.

Schools and Libraries Division



Universal Service Administrative Co.

Adjustment Report

| | |
|----------------------------------|--|
| FCC Form 471 Application Number: | 161048265 |
| Funding Request Number: | 1699109896 |
| Commitment Adjustment: | \$490,773.47 |
| Total Amount to Be Recovered: | \$0.00 |
| Explanation(s): | Failure to timely respond to the Administrator's request for information |
| Party to Recover From: | BEN |
| Funding Year: | 2016 |
| Billed Entity Number: | 135105 |
| Services Ordered: | Internal Connections |
| Service Provider Name: | KGH Corp. |
| SPIN: | 143046895 |
| Original Funding Commitment: | \$490,773.47 |
| Adjusted Funding Commitment: | \$0.00 |
| Funds Disbursed to Date: | \$0.00 |

Funding Commitment Adjustment Explanation:

After a thorough investigation, you failed to respond to requests for documentation. FCC rules provide that an applicant must respond within a reasonable time period when requested to provide additional information pertaining to its request for funding. Since you failed to timely respond to the appeals team requests for Recipient of Service/Budget Issue information related to FY 2016 FCC Form 471#161048265, FRN 1699109896, the commitment of \$490,773.47 has been rescinded in full.

EXHIBIT 3

| FRN | FRN Status | 471 Application Number | BEN | Billed Entity Name | Applicant City | Applicant State | Service Provider Name | Fund Year | Orig Funding Request | Cmt'd Funding Request | Orig FRN Service Type | Wave Number | FCDL Date |
|------------|------------|------------------------|--------|--------------------------------|----------------|-----------------|-----------------------|-----------|----------------------|-----------------------|-----------------------|-------------|-----------|
| 1699109896 | Funded | 161048265 | 135105 | MISSOULA COUNTY PUBLIC SCHOOLS | MISSOULA | MT | KGH Corp. | 2016 | \$530,779.58 | \$0.00 | Internal Connections | 52 | 6/30/2017 |

| FCDL Comment for 471 Application | FCDL Comment for FRN | PC Wave Number | Revised FCDL Date | Post Commitment Rationale | Invoicing Mode | Total Authorized Disbursement |
|---|--|----------------|-------------------|---|----------------|-------------------------------|
| MR1:The applicant did not submit any RAL corrections. | MR1:The applicant did not submit any RAL corrections. MR2:Based on the applicant's request, the One-time Eligible Cost of the FRN's Product and Service Detail was changed from \$884,632.64 to \$817,955.80. | 56 | 08/16/2018 | 56-This appeal has been cancelled because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget. | BEAR | \$0.00 |

EXHIBIT 4

#203377 - 202796 & 202837 #2 Form 500 problems

[Summary](#) [News](#) [Related Actions](#)

▼ Case Details

Topic FCC Form 500 - Other
Status Closed
Priority Medium
Inquiry Type Web

Form Type FCC Form 500
Form Number
Created By Dan Parrish
Created On 10/26/2017 4:12 PM EDT
Organization MISSOULA COUNTY PUBLIC SCHOOLS

▼ Case Description

Description I have submitted case # 202796 which was closed after a quick answer. I called USAC as advised. A new case was created # 202837 and I was to e-mail some screen shots. Those were sent via e-mail as the support person said I should do. When I went in to today to check on that 2nd case, I found it too was closed, though no resolution or help was provided.

Please help as the information coming up in the form 500 filing tool is not working properly for this School District.

▼ Case Artifacts

Documents

| Name | Uploaded By | Upload Date |
|----------------------------|-------------|------------------|
| Form 471 Cat 2 differences | Dan Parrish | 11/3/17 5:49 PM |
| Form 500 Problems | Dan Parrish | 10/26/17 4:12 PM |

Attachments

| Attachment | Attachment Type |
|------------|--------------------|
| | No items available |

▼ Case Thread

| User | Note | Date |
|-------------|---|------------------------|
| | Good Afternoon, | |
| USAC | This case has been pending a response since 12/5/2017. If the FCC Form 500 filing tool is not working properly for this School District, please re-open this case and attach an updated screenshot. This case is now closed. | 12/26/2017 2:55 PM EST |
| | Good Morning, | |
| USAC | For further assistance, please verify if the FCC Form 500 is currently not showing all entities as recipients of service to modify cost. Thank you. | 12/5/2017 10:33 AM EST |
| Dan Parrish | As discussed on the phone 11/2/17, I have attached a file to show detail of the problems with the form 471 FRN line item approved totals reflecting a different amount than the total of the amounts by entity for each individual line item. | 11/3/2017 5:49 PM EDT |
| Dan Parrish | I have just uploaded a file that documents how the form 500 is not bringing up all of the entity details related to a single FNR line item. | 11/2/2017 2:17 PM EDT |
| USAC | Dan, Your inquiry has been received. In order to provide you with a thorough and accurate response, we are currently researching your inquiry. We will provide a response as soon as we have more information. | 10/26/2017 5:04 PM EDT |

5 items

Case Contact

Case Contact Dan Parrish

EXHIBIT 5

Case Details

Topic FCC Form 500 - Form Questions
Status Closed
Priority High
Inquiry Type Web

Form Type FCC Form 500
Form Number 1
Created By Dan Parrish
Created On 10/24/2017 6:42 PM EDT
Organization MISSOULA COUNTY PUBLIC SCHOOLS

Case Description

Description I am having problems completing a Form 500 for FRN 1699109896. Detail by entity for Individual line items is not showing up correctly as far as I can tell.

Case Artifacts

| Documents | | | Attachments | |
|------------------------|-------------|------------------|--------------------|-----------------|
| Name | Uploaded By | Upload Date | Attachment | Attachment Type |
| Form 500 Discrepancies | Dan Parrish | 10/24/17 6:42 PM | No items available | |

Case Thread

| User | Note | Date |
|---|---|------------------------|
| | Dan, | |
| USAC | If you adjust the cost allocation for the one entity, then the overall request for the Total should be adjusted as well. By putting a check next to the school name you should be able to adjust the total. For assistance with this, please call the schools and libraries helpline at 888-203-8100. This way we can further troubleshoot the issue with you and determine if we need to escalate the issue. | 10/25/2017 9:15 AM EDT |
| If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100. | | |

Case Contact

EXHIBIT 6

ROS Allocation Mismatch - #89515



Summary

Associated FRNs

Review Inquiries

News

Related Actions

In-Review

Outreach

Wave Ready

Committed

▼Appeal Information

View Status (-)

Status Your application is under review.

Funding Year 2016

Submitting Organization MISSOULA COUNTY PUBLIC SCHOOLS (BEN: 135105)

Created By USAC

Created On 2/12/2018 2:32 PM EST

▼Main Contact

Name Dan Parrish

Phone Number 406-728-2400

Email dparrish@mcps.k12.mt.us

▼Narrative

USAC discovered that the Recipient of Service (ROS) allocation does not equal the Funding Request Number (FRN) line amounts on your FCC Form 471. Therefore, USAC has created an appeal record on your behalf to review your application. After our review is complete, you will receive a Revised Funding Commitment Decision Letter. There is no action required by you at this time.

▼Appeal Details

Decision appealed by applicant Funding Commitment Decision Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

View Supporting Documentation (+)

EXHIBIT 7

#233709 - Problems in USAC with 471 #161048265 preventing completion of Form 500



Summary News Related Actions

▼ Case Details

Topic Appeals - Status Inquiry

Status Closed

Priority High

Inquiry Type Web

Created By Dan Parrish

Created On 4/11/2018 12:48 PM EDT

Organization MISSOULA COUNTY PUBLIC SCHOOLS

▼ Case Description

Description We are having problems in USAC with 471 #161048265 which is preventing completion of Form 500. We need to reduce amounts related to four schools in that Form 471 so we can avoid denial of our most current 471. There was some data that apparently was corrupted in EPC and the detail for a number of line items in FRN 1699109896 (of Form 471 # 161048265) did not total up to the total of the line item. USAC issued a request for us to provide additional detail for those problem line items. The ROS was labeled as 'ROS Allocation Mismatch - #89515 and the corrections were sent in in mid February. That document is attached to this case, as well as a separate file for an additional problem with line item # 1699109896.001. In the original form of the 471, this item had five schools/entities attached to it and it totaled \$242,019.93. They were 67907, 67909, 67910, 67923 and 67928. However, in the approved 471, that line item had only one entity (# 67909) and the total for this entity was the total funded amount of \$178,236.69. However, in the original application, the amount for this line item for entity # 67909 was only \$24,588.64. Furthermore, this entity (#67909) is one of the four entities that we have a new (2018-19) Form 471 filed. The other three entities are #67911, 67922, and 16027875. Please note there have been other support cases on this topic & those were related to funding requests on a 2017-18 Form 471. Also, it is urgent that we can clear up this problem because our 2018-19 requests may be denied with out our being able to correct the prior year commitments. A form will be forthcoming to show in detail what we would like to cancel or reduce on 471 #161048265. Thank you.

▼ Case Artifacts

Documents

| Name | Uploaded By | Upload Date |
|--|-------------|------------------|
| ROS Mismatch - 89515 | Dan Parrish | 4/11/18 12:48 PM |
| Cat2 FRN # 1699109896.001 discrep4-11-18 | Dan Parrish | 4/11/18 12:48 PM |

Attachments

| Attachment | Attachment Type |
|------------|--------------------|
| | No items available |

▼ Case Thread

▼ Case Thread


| User | Note | Date |
|-------------|--|------------------------|
| | Dan, Thank you for contacting USAC regarding the status of your appeal. Your appeal is currently under review. Should USAC have questions while processing your appeal, they may contact you. In order to prepare, we advise you to consider the following: • Have all documentation to support the appeal, including forms and previous correspondence. • Respond to requests for additional information in a timely manner. • Always let us know if you need additional time to respond. As it has been more than 90 days since we received your appeal, we will escalate your case to request additional information on the status. We are working diligently to successfully process all appeals and you should receive further information soon. | |
| USAC | • Have all documentation to support the appeal, including forms and previous correspondence. • Respond to requests for additional information in a timely manner. • Always let us know if you need additional time to respond. As it has been more than 90 days since we received your appeal, we will escalate your case to request additional information on the status. We are working diligently to successfully process all appeals and you should receive further information soon. | 4/26/2018 1:31 PM EDT |
| Dan Parrish | Could we get an update on the status of the ROS information which was requested on 2-12-18 and submitted shortly there after. This ROS information was related to form 471 # 161048265 and FRN 1699109896. Did the support person not receive the document that was provided? which would. In particular, entity # 67909 has very strange information showing when I look at its Cat 2 budget. Thanks. | 4/26/2018 1:13 PM EDT |
| USAC | Dan, We see that you reopened this case but we have not received any new information. If you have a question or concern, please submit it as a note to the case. Dan, The following review note was left on 3/30/18: "No fault return Cannot pass yet. Increasing ROS shares to match up FRN line amounts caused C2 Over-budget issue (Exp# 17) on 5 entities. EN 67909 WASHINGTON MIDDLE SCHOOL (\$133,641.64) EN 67910 SENTINEL HIGH SCHOOL (\$102,914.34) | 4/26/2018 12:48 PM EDT |
| USAC | EN 67923 Meadow Hill Middle School (\$29,255.94) EN 67925 Hawthorne Elementary School (\$23,239.42) EN 67928 Big Sky High School (\$73,806.65) Cost allocations made during PIA Exp# 17 review was partially undone during this Appeal process when ROS was increased to FRN line amount. Therefore, cost allocation on ROS need to be made and that ROS allocations need to be equal to FRN line amount. Thank you. It would appear that you need to contact the reviewer as soon as possible with the requested information, or in order to receive more information about what needs to be provided. Unfortunately, we do not have this information and you will need to get in contact with the reviewer. If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100. | 4/11/2018 1:09 PM EDT |

Case Contact

Case Contact Dan Parrish

EXHIBIT 8

#262141 - Bear Form Remitt Q - Appl 161048265

 UPDATE CASE

Summary News Related Actions

Case Details

Topic System Problem Report - FCC Form 472
Status Pending
Priority Medium
Inquiry Type Web

Form Type FCC Form 472
Form Number 2822715
Created By Dan Parrish
Created On 1/18/2019 5:38 PM EST
Organization MISSOULA COUNTY PUBLIC SCHOOLS

Case Description

Description We had submitted a Form 472 on June 18, 2018 and have not received payment. I am following up on the status of this payment.

Case Artifacts

Documents

| Name | Uploaded By | Upload Date | Attachment | Attachment Type |
|---------|-------------|------------------|------------|--------------------|
| Capture | USAC | 1/21/19 11:25 AM | | No items available |
| Capture | USAC | 1/21/19 11:25 AM | | |

Attachments

Case Thread

| User | Note | Date |
|------|---|-----------------------|
| Dan | <p>Your case has been escalated to Customer Service Management at USAC. I have confirmed your invoice #:</p> <p>2822715 has not been processed due to a potential rule violation. A Commitment Adjustment Letters was issued to your entities Account Administrator on 10/17/2018. For more information, refer to the Commitment Adjustments page on the Schools and Libraries website: http://usac.org/sl/applicants/before-youre-done/commitment-adjustments.aspx</p> <p>If you disagree with your COMAD or RIDF letters we highly recommend you file an appeal with USAC within 60 days of receiving your communication.</p> <p>I have provided the steps of how to file an appeal to USAC below:</p> <p>There are three paths to beginning an appeal in EPC:</p> <ol style="list-style-type: none">1. You can reach it from the Landing Page. Click Appeal in the list of options at the top right, or2. You can reach it from the top-right drop-down menu on the Entity Summary Page. Click Create Appeal, or3. You can reach it from the Related Actions section of the Entity Summary Page. Click Create Appeal. <p>The remaining steps are as follows:</p> <ol style="list-style-type: none">1. On the first page, enter a Nickname for your appeal and choose the appropriate Funding Year.2. Select the appropriate options under What type of decision you would like to appeal?, "Appeal Type", and "Appeal Category".3. Enter the name of the Main Contact Person. Click Continue.4. On the next page, under Choose Search Method, choose Search by FRN or Search by Post-Commitment Request.<ol style="list-style-type: none">a. If you chose Search by FRN, use the filters to find the FRN(s) for which you would like to submit an appeal.<ol style="list-style-type: none">i. Place a checkmark next to the FRNs and click Add (#) FRNs.ii. To remove an FRN, place a checkmark next to it and select Remove (#) FRNs.iii. After all appropriate FRNs are listed under Selected FRNs, click Continue.b. If you chose Search by Post-Commitment Request, use the filters to find the post-commitment request for which you would like to submit an appeal.<ol style="list-style-type: none">i. The system will automatically select all of the FRNs associated with the selected post-commitment request. If any FRNs should be excluded, check the box(es) next to the FRN(s) under the section FRNs associated with Post-Commitment Request and click Remove (#) FRNs.ii. Once only the correct FRNs are listed under FRNs associated with Post-Commitment Request click Continue.5. On the next page, you may enter up to 2000 characters in the Narrative field to describe your appeal.6. Attach any supporting documentation using the Upload Document section.7. Click Submit and confirm by clicking Yes in the pop-up. | |
| USAC | | 1/28/2019 1:55 PM EST |

Additional information about appeals appears on the following page on the Schools and Libraries website: <http://www.usac.org/sl/about/program-integrity/appeals.aspx>

| | | |
|-------------|--|-----------------------|
| | <p>Hello, We additionally would like to add a little more information after sorting through much information. A number of the cases that this District had opened in the last 12 months involved problems with not being able to complete Form 500. There were USAC responses that included actions to take. One of the actions included working with the reviewer to solve the problems where our total requests for certain schools were higher than the allowed budget. This primarily occurred because prior year funding commitments were still outstanding and needing to be reduced through Form 500. We did work with the reviewer to correct those issues. And, for the schools having had work done during the funding year which was related to FRN 1699109896, we had legitimately completed a BEAR (472) Form for funding requests that were valid and appropriate. We are asking USAC to reinstate the funding requests for those items which were appropriately requested on BEAR Form # 2822715.</p> | |
| Dan Parrish | | 3/1/2019 12:07 PM EST |
| Dan Parrish | <p>I believe a mistake has been made and am respectfully requesting that USAC review this case. I have reviewed back through all of the inquiries in MUNIS for this Funding Request and see that all inquiries were answered timely and prior to the funding commitment being made. If there were other items that I have missed after the funding commitment was made, I am unaware of those and hoping I could get more information on them. Thank you.</p> | 2/20/2019 5:53 PM EST |
| Dan Parrish | <p>In my prior note, I used the term 'MUNIS'. However, that should have read 'EPC'. Thank you.</p> | 2/20/2019 5:55 PM EST |
| Dan Parrish | <p>In reading the response below, I am confused. In both communications dated 1/21/19 and 1/28/19 it is noted that my case has been escalated. However, it is also mentioned that an appeal is highly recommended. Could I please get confirmation about whether customer service is looking into this situation and planning to provide me additional information. At this point I cannot find any requests for information that I did not respond to. Thank you.</p> | 2/20/2019 6:03 PM EST |

Thank you for contacting USAC Client Service Bureau regarding The status of your invoice.

Invoice# 2822715 was denied on 11.12.2018 due to a systems error.
We have escalated your case to USAC customer service management for a response.
Please allow time for a response.
If you have additional questions, please contact us at (888)-203-8100.

USAC

1/21/2019 11:23 AM EST

Thank you,
Sabrina Glover
Universal Service Administrative Company (USAC)
Client Service Bureau
(888) 203-8100

EXHIBIT 9

#239970 - EPC system throwing errors



Summary

News

Related Actions

▼ Case Details

Topic FCC Form 472 - BEAR - Other
Status Closed
Priority High
Inquiry Type Web

Form Type FCC Form 472
Form Number
Created By Dan Parrish
Created On 6/14/2018 5:36 PM EDT
Organization MISSOULA COUNTY PUBLIC SCHOOLS

▼ Case Description

Description We had tried to file a form 472 today. The first submission failed with an EPC 'server error' upon our attempt to submit. The 2nd attempt threw a message that our vendor had not filed a Form 473 for the applicable year. We contacted the vendor to file the Form 473 which they attempted, but they are continuing to get errors upon their attempts. Our filing deadline is Monday June 18th. We must presume that if the vendor is unable to submit their certification by the deadline, due to errors in EPC, this District will be allowed extra time to finish filing once the vendor is certified. Please confirm. This relates to Form 471 # 161048265 and FRN #1699109896. The vendor SPIN is 143046895.

▼ Case Artifacts

Documents

| Name | Uploaded By | Upload Date | ↓ | Attachment | Attachment Type |
|--------------------|-------------|-------------|---|--------------------|-----------------|
| No items available | | | | No items available | |

Attachments

▼ Case Thread

| User | Note | Date | ↓ |
|------|---|-----------------------|---|
| | Thank you for contacting USAC Client Service Bureau regarding your invoice. | | |
| | FCC rules allow for a single, one-time 120-day extension of the deadline to submit an invoice – FCC Form 472 BEAR or FCC Form 474 SPI - but the request for an extension must have been submitted on or before the current invoicing deadline. | | |
| | If you missed your original or extended invoicing deadline, you may file a waiver request with the FCC to request an extension. Then, if the request is approved, you may invoice. | | |
| USAC | To file a waiver request, please follow the instructions for submitting an FCC appeal on the Schools and Libraries website: http://www.usac.org/about/about/program-integrity/appeals.aspx | 6/15/2018 3:58 PM EDT | |
| | If you have any questions or believe this case was closed incorrectly, please re-open this case or contact us at (888) 203-8100. | | |
| | Thank you, Derrick H Universal Service Administrative Company (USAC) Client Service Bureau (888) 203-8100 | | |

Case Contact

Case Contact Dan Parrish

EXHIBIT 10

As shown in EPC as Approved:

leased?

Cost Calculation for FRN Line Item #1699109896.001

| Monthly Cost | | One-Time Cost | |
|---|----------|---|----------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$50.99 |
| Monthly Recurring Unit Ineligible Costs | \$0.00 | One-time Ineligible Unit Cost | \$11.98 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$39.01 |
| Monthly Quantity | 0 | One-time Quantity | 4569 |
| Units | Each | Total Eligible One-time Costs | = \$178,236.69 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$178,236.69 |
| | | Pre-Discount Extended Eligible Line Item Cost | = \$178,236.69 |

Recipients of Service

| Entity | Entity Number | Eligible Cost per Entity |
|--------------------------|---------------|--------------------------|
| WASHINGTON MIDDLE SCHOOL | 67909 | \$178,236.69 |

As per originally filed in Form 471:

Product and Service Details

| | | | |
|-----------------------------|--------------------|-----------------|--|
| Type of Internal Connection | Cabling/Connectors | Type of Product | Cabling |
| Make | Other | Model | CAT 6 SOLID COPPER 22-24 AWG 6 UTP CABLE ANSI/TIE/ EIA -568-B.2-10 COMPLIANT |

Is installation included in Price? No
Is the hardware for this FRN line item leased? No

Cost Calculation for FRN Line Item # 1699109896.001

| Monthly Cost | | One-Time Cost | |
|---|----------|---|----------------|
| Monthly Recurring Unit Cost | \$0.00 | One-time Unit Cost | \$65.72 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$12.75 |
| Monthly Recurring Unit Eligible Costs | = \$0.00 | One-time Eligible Unit Cost | = \$52.97 |
| Monthly Quantity | x 0 | One-time Quantity | x 4569 |
| Units | 0 | Total Eligible One-time Costs | = \$242,019.93 |
| Total Monthly Eligible Recurring Costs | = \$0.00 | Summary | |
| Months of Service | x 12 | Total Eligible Recurring Costs | \$0.00 |
| Total Eligible Recurring Costs | = \$0.00 | Total Eligible One-time Costs | + \$242,019.93 |
| | | Pre-Discount Extended Eligible Line Item Cost | = \$242,019.93 |

Recipients of Services

| BEN | Name | Amount |
|-------|---------------------------|-------------|
| 67907 | HELLGATE HIGH SCHOOL | \$60,980.06 |
| 67909 | WASHINGTON MIDDLE SCHOOL | \$24,588.64 |
| 67910 | SENTINEL HIGH SCHOOL | \$67,293.35 |
| 67923 | MEADOW HILL MIDDLE SCHOOL | \$21,706.42 |
| 67928 | BIG SKY HIGH SCHOOL | \$67,451.46 |

EXHIBIT 11



Universal Service
Administrative Co.

August 15, 2018

Revised Funding Commitment Decision Letter

Funding Year 2016

Contact Information:

Dan Parrish
MISSOULA COUNTY PUBLIC SCHOOLS
215 S 6TH ST W
MISSOULA, MT 59801
dparrish@mcps.k12.mt.us

BEN: 135105

Post Commitment Wave: 56

Totals

| | |
|----------------------------------|---------------|
| Original Commitment Amount | \$490,773.47 |
| Revised Commitment Amount | \$0.00 |

What is in this letter?

Thank you for submitting your post-commitment request for **Funding Year 2016 Schools and Libraries Program (E-rate) funding**. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: MISSOULA COUNTY PUBLIC SCHOOLS

BEN: 135105

Post Commitment Wave: 56

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System \(ECFS\)](#). Include your contact information, a statement that your filing is a waiver request,



BEN Name: MISSOULA COUNTY PUBLIC SCHOOLS

BEN: 135105

Post Commitment Wave: 56

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: MISSOULA COUNTY PUBLIC SCHOOLS

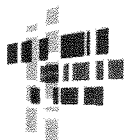
BEN: 135105

Post Commitment Wave: 56

Revised Funding Commitment Decision Overview

Funding Year 2016

| Funding Request Number (FRN) | Service Provider Name | Request Type | Revised Committed | Review Status |
|------------------------------|-----------------------|--------------|-------------------|---------------|
| 1699109896 | KGH Corp. | Appeals | \$0.00 | Cancelled |



BEN Name: MISSOULA COUNTY PUBLIC SCHOOLS

BEN: 135105

Post Commitment Wave: 56

| | | |
|---|---|---|
| Post Commitment Request Number: 89515 | Post Commitment Request Type: Appeals | Post Commitment Decision: Cancelled |
|---|---|---|

| | | | |
|--------------------------------|--|-----------------------------------|----------------------------------|
| FRN: 1699109896 | Service Type: Internal Connections | Original Status: Funded | Revised Status: Funded |
| FCC Form 471: 161048265 | | | |

| Dollars Committed | | | |
|----------------------------------|--------|---------------------------------|--------|
| Monthly Cost | | One-Time Cost | |
| Months of Service | 12 | | |
| Total Eligible Recurring Charges | \$0.00 | Total Eligible One Time Charges | \$0.00 |
| Total Pre-Discount Charges | | \$0.00 | |
| Discount Rate | | 60.00% | |
| Revised Committed Amount | | \$0.00 | |

| Dates | |
|----------------------------------|-----------|
| Service Start Date | 7/1/2016 |
| Contract Expiration Date | 7/31/2017 |
| Contract Award Date | 4/16/2015 |
| Service Delivery Deadline | 9/30/2018 |
| Expiration Date (All Extensions) | |

| Service Provider and Contract Information | |
|--|-----------------|
| Service Provider | KGH Corp. |
| SPIN (498ID) | 143046895 |
| Contract Number | |
| Account Number | |
| Establishing FCC Form 470 | 983410001278699 |

| Consultant Information | |
|-------------------------------|--|
| Consultant Name | |
| Consultant's Employer | |
| CRN | |

| |
|--|
| Revised Funding Commitment Decision Comments: |
|--|

| |
|-----------------------------------|
| Post Commitment Rationale: |
|-----------------------------------|

This appeal has been cancelled because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget.

EXHIBIT 12

Universal Service for Schools and Libraries

Please read instructions before
completing.

(To be completed by schools, libraries, or
consortia.)

BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Only one Service Provider Identification Number (SPIN) per form.

Must be completed and signed by the Billed Entity Applicant.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting burden for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Applicant Form Identifier (Create an identifier for your
own reference)
Cat2_MCPS_FY17

FCC Form 472 Invoice #
(To be inserted by administrator) 2822715

BLOCK 1: HEADER INFORMATION

| | |
|---|------------------------------|
| 1. Billed Entity Name | MISSOULA COUNTY HIGH SCHOOLS |
| 2. Billed Entity Number | 135105 |
| 3. Service Provider Identification Number (SPIN) | 143046895 |
| Applicant FCC Form 498 ID | 443017064 |
| 4. Contact Name | DAN PARRISH |
| 5. Contact Telephone Number | 406- 7282400 ext 3031 |
| 6. Total Reimbursement Amount (total from Block 2, Column 14) | \$129,873.31 |

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name MISSOULA COUNTY HIGH SCHOOLS Billed Entity Number 135105

Contact Name DAN PARRISH Contact Telephone Number 406-72824003031

Applicant Form Identifier Cat2 MCPS FY17

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

| (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
|---|--|------------------------------|--|--|---|---------------|---|
| FCC Form 471 Application Number (from Funding Commitment Decision Letter) | Funding Request Number (FRN) (from Funding Commitment Decision Letter) | Bill Frequency | Customer Billed Date (mm/yyyy) | Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy) | Total (Undiscounted) Amount for Service | Discount Rate | Amount Billed to USAC (Column 12 multiplied by Column 13) |
| | | DO NOT WRITE IN THIS COLUMN. | For each FRN, complete either Column (10) or Column (11), but not both Columns | | | | |
| 1 | 161048265 | 1699109896 | ON DELIVERY | 6/30/2017 | \$216,455.52 | 60.00 | \$129,873.31 |
| 2 | | | | | | | |
| 3 | | | | | | | |
| 4 | | | | | | | |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | | | | | | | |
| 8 | | | | | | | |
| 9 | | | | | | | |
| 10 | | | | | | | |
| 11 | | | | | | | |
| 12 | | | | | | | |
| 13 | | | | | | | |
| 14 | | | | | | | |

TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6) **\$129,873.31**

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name MISSOULA COUNTY HIGH SCHOOLS

Billed Entity Number 135105

Contact Name DAN PARRISH

Applicant Form Identifier Cat2 MCPS FY17

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in this Billed Entity Applicant Reimbursement Form represent charges for eligible services and/or equipment delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- B. The discount amounts listed in this Billed Entity Applicant Reimbursement Form were already billed by the Service Provider and paid for by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in this Billed Entity Applicant Reimbursement Form are for eligible services and/or equipment approved by the Fund Administrator pursuant to a Funding Commitment Decision Letter (FCDL).
- D. I acknowledge that I may be audited pursuant to this application and will retain for at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records that I rely upon to complete this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person **Signed electronically by DAN PARRISH**

16. Date **6/18/2018**

17. Printed name of authorized person **DAN PARRISH**

18. Title or position of authorized person **ACCOUNT SPECIALIST AND INTERIM**

19. Telephone number of authorized person **406- 7282400 ext 3031**

20. Address of authorized person **915 SOUTH AVENUE WEST, MISSOULA MT 59801-7910**

EXHIBIT 13



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

November 16, 2018

Douglas Shoup
KGH Corp.
801 Ronan St. Ste 2
Missoula, MT 59801

Re: Invoice Number - as assigned by USAC: 2822715
Service Provider Identification Number: 143046895
Reimbursement Form Number: Cat2_MCPS_FY17
Billed Entity Number: 135105

Parrish Dan
MISSOULA COUNTY PUBLIC SCHOOLS
215 S 6TH ST W
MISSOULA, MT 59801

Preferred Mode of Contact: E-mail at dparrish@mcps.k12.mt.us
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received

by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN), - FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2015," AND
 - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542. To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the

items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client

Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: MISSOULA COUNTY PUBLIC SCHOOLS

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 161048265

Funding Request Number: 1699109896

Funding Year 2016: 07/01/2016 - 06/30/2017

Contract Number:

Funding Commitment Decision: \$0.00

Reimbursement Amount for this FRN: \$0.00

Reimbursement Request Decision Explanation:

No Payment, Total Commitment Paid;



Schools and Libraries Division Correspondence Unit
30 Lanidex Plaza West
PO Box 685 Parsippany, NJ 07054-0685

TIME SENSITIVE MATERIAL

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